

BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C. 20554

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JUN 30 1994

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of

Administration of the  
North American Numbering Plan

CC Docket No. 92-237  
Phases One and Two

REPLY OF SOUTHWESTERN BELL CORPORATION

SOUTHWESTERN BELL CORPORATION

James D. Ellis  
Paula J. Fulks

Attorneys for  
Southwestern Bell Corporation

175 E. Houston  
Room 1218  
San Antonio, Texas 78205  
(210) 351-3424

SOUTHWESTERN BELL TELEPHONE COMPANY

Robert M. Lynch  
Richard C. Hartgrove  
J. Paul Walters, Jr.

Attorneys for  
Southwestern Bell Telephone Company

One Bell Center, Room 3520  
St. Louis, Missouri 63101  
(314) 235-2507

June 30, 1994

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REPLY OF SOUTHWESTERN BELL CORPORATION

Table of Contents

SUMMARY . . . . .	i
I. CENTRAL OFFICE CODE ASSIGNMENT . . . . .	1
II. DISPUTE RESOLUTION . . . . .	3
III. LOCAL NUMBER PORTABILITY . . . . .	5
IV. FCC AS NORTH AMERICAN NUMBERING PLAN ADMINISTRATOR . .	6
V. FUNDING . . . . .	9
VI. UNIFORM DIALING OF "1" AS A TOLL INDICATOR . . . . .	10
VII. CIC TRANSITION . . . . .	11
VIII. INTERSTATE, INTRALATA TRAFFIC . . . . .	12
IX. CONCLUSION . . . . .	13

### SUMMARY\*

Many Comments filed in this docket are ill-disguised attempts to promote the business interests of one party over another. SBC believes the numbering issues raised in this docket involve serious questions of public policy and deserve objective and dispassionate examination.

SBC is not strongly opposed to the eventual transfer of the CO code assignment function from Bellcore and LECs, but believes that the issue should be deferred until transfer of the existing NANPA responsibilities is completed. Teleport's grandstanding ploy of requesting CO codes illustrates how difficult the assignment process has become.

Dispute resolution should be built into the number assignment process. The Commission should provide general oversight over numbering issues and function as the arbiter of last resort when dispute resolution has proved ineffective. A party involved in the dispute resolution process should not retain the right to file a complaint with the Commission at any time. If only a single company can do so, the entire industry can be held hostage to whimsy or worse.

The Commission has correctly deferred consideration of local number portability to a future proceeding. It is misleading in the extreme to suggest that anyone understands the issues surrounding local number portability, or even understands what all the issues might be. Anyone suggesting otherwise is simply wrong.

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\* All abbreviations used herein are referenced within the text.

The Commission should not act as the NANPA. The Commission should instead act as the arbiter of last resort, not as the initial decision-maker. If the Commission begins assigning numbers, the only alternative available to a disgruntled party would be the courts--a recipe for delay and expense. The Commission should enter a dispute only if resolution has proved impossible.

SBC also opposes Allnet's suggestion that numbering issues should be decided by the Commission's notice and comment format without first utilizing the existing consensus process. Because administrative proceedings tend to take on quasi-judicial trappings and ultimately discourage teamwork and conciliation, this proposal would almost certainly slow number assignment and dispute resolution to a crawl.

The Commission should reject suggestions that fees for the new NANPA be assessed "retroactively." The BOCs have been paying (by funding Bellcore) for NANP administration for ten years. Basing a fee on retroactive use would require the BOCs to pay twice.

SWBT's dialing procedures already use the digit "1" as a toll indicator. Federal intervention in this area is unnecessary. In addition, though SBC supports the concept of uniform dialing using "1" as a toll indicator, any such plan would be extremely cumbersome to implement. Uniform dialing is currently being addressed by the industry, where the issue should remain.

A six year CIC transition period is too long, primarily

because of the dialing parity issue, but also because the 2000 codes will probably not last six years. SBC supports Sprint's suggestion that the Commission consider requiring carriers to turn in their excess CICs to help postpone CIC exhaust. If the Commission does not choose an 18 month transition period, as SBC recommends, then SBC recommends that a monitoring scheme be adopted to allow the industry a realistic amount of time in which to react should the codes prematurely exhaust.

As long as SWBT is not allowed to compete for interLATA traffic, any requirement that SWBT deliver interstate, intraLATA toll traffic to the presubscribed carrier will be the equivalent of prohibiting SWBT's provision of such service. The only remote link between this issue and the administration of the NANP is that the NANPA assigns CICs. Thus, it would be inappropriate, and a denial of due process, for the Commission in this docket to order LECs to deliver interstate, intraLATA traffic to a customer's presubscribed IXC.

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**REPLY OF SOUTHWESTERN BELL CORPORATION**

Southwestern Bell Corporation (SBC), on behalf of its subsidiaries Southwestern Bell Telephone Company (SWBT) and Southwestern Bell Mobile Systems, Inc. (SBMS), submits its Reply in response to Comments filed herein. Predictably, the Comments, in many cases, are nothing more than ill-disguised attempts to promote the business interests of one party over another. Yet the numbering issues raised in this docket involve serious questions of public policy and deserve objective and dispassionate examination. The welfare of the Public Switched Telephone Network (PSTN) is of primary importance here, not the bottom line of individual corporations.

**I. CENTRAL OFFICE CODE ASSIGNMENT**

Almost all commentators support either the transfer of, or consideration of the transfer of, Central Office (CO) Code assignment functions from Bellcore and Local Exchange Carriers (LECs) to a new third-party North American Numbering Plan Administrator (NANPA). Several, including SBC, suggest that the issue be deferred until transfer of the existing NANPA responsibilities is completed<sup>1</sup> and other related issues are

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<sup>1</sup> US West at 8-11, Bell Atlantic at 4.

analyzed.<sup>2</sup> While most LECs currently assigning CO codes do not relish the job, given the constant allegations of bias and anticompetitive behavior, they feel a responsibility to ensure that a transition be considered in a focused and intelligent manner. Clearly, CO code assignment is a complex issue which cannot and should not be decided overnight. Additionally, centralization of this function may not be easy. The role that state regulators and Commissions play in this process, especially in terms of dialing plans and relief plans, simply cannot be ignored.

Teleport Communications Group (TCG) has added a bizarre twist to the proceedings by stating that it is filing CO code requests with certain Bell Operating Companies (BOCs), and further that it will "report to the Commission through our reply comments which RBOCs complied with the Guidelines and which did not."<sup>3</sup> TCG, by requesting CO codes which it very likely does not need,<sup>4</sup> is grandstanding, trivializing the CO code assignment process to gain some notoriety while failing to appreciate the importance and responsibility of conserving a genuinely public resource. In its role as a CO code administrator, SWBT has processed the TCG code requests on the basis of SWBT's interpretation of TCG's eligibility to obtain CO codes under the terms of the Central Office Code Assignment Guidelines. Because of confidentiality concerns, SWBT, unlike TCG, cannot announce to the world the result. This ploy by

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<sup>2</sup> Pacific and Nevada Bell at 6-7, NYNEX at 10-11.

<sup>3</sup> Teleport at 4.

<sup>4</sup> SWBT has never before received any requests from TCG for CO codes. Yet suddenly, in conjunction with this proceeding, TCG requested several codes in SWBT's service area.

TCG, however, illustrates just how difficult the assignment process can become when self-serving business entities, with little concern for the PSTN, begin to raise their already clamorous voices.

## II. DISPUTE RESOLUTION

SBC, along with several other commentators, believes that dispute resolution should be built into number assignment, much as software and copy machines are now being designed to "fix themselves."<sup>5</sup> The ideal, of course, would be never to have a breakdown, but dispute in competitive arenas is inevitable. Pacific and Nevada Bell are thus correct in stating that a "conciliation process added to the forum process would make it more efficient."<sup>6</sup> SBC agrees also with BellSouth that the "Commission should continue to provide general oversight over numbering issues and function as the final arbiter on numbering matters."<sup>7</sup>

Though favoring some form of dispute resolution, SBC does not agree with MCI's mediation proposal, which is actually a proposal for binding arbitration. First, MCI suggests that the clock for dispute resolution should start "when an issue is introduced at the industry numbering activity."<sup>8</sup> The industry often accepts an issue for resolution while, at the same time, recognizing that other issues may take priority. SBC does not oppose the establishment of a time frame for resolution of an

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<sup>5</sup> To date, software seems to be having more luck.

<sup>6</sup> Pacific and Nevada Bell at 5.

<sup>7</sup> BellSouth at 7.

<sup>8</sup> MCI at Exhibit A, p. 2.



issue, but there must be a measure of flexibility. If an issue is close to resolution, the proposed completion date must be expandable.

MCI also suggests that any party should be able to commence arbitration nine months after the clock begins ticking.<sup>9</sup> However, the industry as a whole, or at least a significant portion, should believe that impasse has been reached before invoking dispute resolution. If only a single company can do so, the entire industry can be held hostage to whimsy or worse.

MCI also suggests that any participant dissatisfied with the course of dispute resolution should "retain the right to file a regulatory complaint at any time."<sup>10</sup> Such a right would make a mockery of mediation/arbitration, giving a disgruntled participant the opportunity to "cut and run" if the proceedings take an unexpected turn. Parties should retain the right of appeal to the Commission, but only after completion of dispute resolution, not before. Thus, SBC does not agree with suggestions that parties participating in industry-based arbitration should not be allowed to escalate the issue to the Commission.<sup>11</sup> The Commission must remain available as the decision-maker of last resort.

Although SBC prefers consensus building to arbitration, SBC does support that portion of AT&T's proposal allowing dispute resolution to be invoked only after the Oversight Committee has "narrowed the issues to a choice between two alternatives, where

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<sup>9</sup> Id.

<sup>10</sup> Id.

<sup>11</sup> Sentor Resource Centre, Inc. at 5.

two distinct parties or industry groups are unable to resolve a particular disagreement, or where implementation disputes arise that require expedited resolution."<sup>12</sup> Dispute resolution can be one of several useful horses in the numbering policy stable, but it should be ridden only under limited and appropriate conditions.

### III. LOCAL NUMBER PORTABILITY

The issue of local number portability demonstrates clearly how companies will, in numbering matters, place business interest ahead of public interest. The Commission, in Paragraph 44 of its Notice of Public Rulemaking initiating this Comment and Reply Cycle, measures the situation and states:

We believe far more study of the technical feasibility, implementation costs, and overall benefits of such portability is needed before we can determine whether this Commission should mandate local number portability. Accordingly, we defer consideration of this issue to a future proceeding.

Nevertheless, several parties took the opportunity to argue on the record that local number portability is the greatest thing since beer in cans and should be implemented as rapidly as possible.

It is clear that local number portability could be implemented using the same data base inquiry network architecture which currently supports 800 portability. Indeed, even the entrenched local exchange providers acknowledge that local number portability is 'functionally equivalent to [portable] 800 service. . . . It's possible to use some kind of AIN deployment where every call is halted and a query made to a database to determine who and over which facilities to route the

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<sup>12</sup> AT&T at 11-12.

call,' but the LECs then go on to insist that 'It's the mother of all data bases in the sky.' [Emphasis added]<sup>13</sup>

It is misleading to the point of absurdity to claim that anyone understands all of the issues surrounding local number portability, or even understands what they all might be. "Some kind of AIN deployment" is a rather slender reed upon which to support the PSTN.

Other commentators claim that local number portability will solve number exhaust problems.<sup>14</sup> Architecture and/or service provisioning methods, however, could require for local number portability both routing numbers and dialable numbers, thus layering a new dialing scheme on top of existing numbers, thereby worsening rather than lessening the drain on NANP resources.

The Commission was absolutely correct in deferring this thorny issue to a later day, and anyone suggesting otherwise is dead wrong.

#### IV. FCC AS NORTH AMERICAN NUMBERING PLAN ADMINISTRATOR

SBC does not agree with Allnet that the FCC itself should act as the NANPA.<sup>15</sup> The Commission should act as the arbiter of last resort in numbering disputes, not as the initial decision-maker. If the FCC gets into the business of assigning numbers, and if a carrier is dissatisfied with an FCC decision, to whom does the carrier turn for relief? The only available alternative in such a

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<sup>13</sup> ALTS at 6-7, quoting "Ameritech's Mr. Nelson Ledbetter" in a trade press article from America's Network.

<sup>14</sup> TCG at 9.

<sup>15</sup> Allnet at 7.

case would be the courts--probably the federal system--a recipe for certain delay and expense. SBC believes that the better course is for a private and independent contractor to act as the NANPA, and for numbering disputes to be worked out, if possible, within the industry itself. The Commission should enter the dispute only if resolution has proved impossible.

SBC agrees with NECA that the policy board suggested by the Commission in this docket would be unlikely to resolve issues better than industry numbering organizations.<sup>16</sup> Such a board would be simply another layer of bureaucracy and would place industry representatives in constant conflicts of interest, much as the BOCs are now placed in regarding CO code assignment. As MCI suggests, the Commission should "concentrate its efforts on establishing a fair and efficient industry mechanism to handle numbering issues, while recognizing that there will always likely exist subsets of issues which the industry is not capable of resolving through consensus."<sup>17</sup> It goes without saying, then, that SBC does not support the suggestion that a policy board be "charged with the pro-active duty of scrutinizing NANP policies with a sharp eye to advancing competition in local telecommunications market whenever possible."<sup>18</sup> If the Commission goes against industry wishes and establishes some sort of policy board, though SBC thinks this would be a mistake, such a board must be subject to strictures of due process and otherwise be limited to issues of numbering policy.

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<sup>16</sup> NECA at 12.

<sup>17</sup> MCI at 12.

<sup>18</sup> ALTS at 5.

Issues of public policy should be decided by the Commission.

Allnet complains that a system of decision by industry committee favors carriers which "can afford to send as many employees as possible to expensive locations throughout the United States."<sup>19</sup> Numbering decisions should be made by the Commission because "[t]he notice and comment proceeding of the FCC is far less expensive to participate in and far more above-board than the operations of these standards committees."<sup>20</sup>

Commission pleading cycles may be less expensive than the committee process, or they may not be. The issue is far from clear, in large measure because that small percentage of lawyers who love to make spurious arguments is usually not involved in committee work (unlike Commission pleading cycles). Moreover, administrative proceedings tend to take on quasi-judicial trappings and ultimately discourage teamwork and conciliation. Unilateral agency decisions are usually rendered slowly and often satisfy no one at all.<sup>21</sup> Submitting numbering issues to the Commission's comment and reply cycle would be as inappropriate and unnecessary as employing the federal court system, with the Federal Rules of Evidence, to determine the winners of Academy Awards.

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<sup>19</sup> Allnet at 7.

<sup>20</sup> Id.

<sup>21</sup> The recent Order in the Caller ID docket (91-281) is a shining example. By SBC's count, 65 petitions for reconsideration have been filed.

## V. FUNDING

MFS suggests that NANPA funding be recovered "through a modest fee on all users of numbering resources in proportion to their direct use of such resources."<sup>22</sup> Under this proposal, different carriers would pay different amounts, apparently based on their "use" of numbers. Does this mean that the more numbers a carrier's customers have, the more fees the carrier pays? If so, or if some similar mechanism is involved, then MFS's proposed fee would be more modest for some than for others.<sup>23</sup> The MFS proposal is obviously designed to require the BOCs to pay the bulk of all fees. SBC suggests that the funding burden be spread more equitably among all carriers utilizing numbering resources, including MFS.

In a similar vein, Teleport demands that fees for the new NANP administrator be assessed "retroactively." "[F]ees for NANP resources must be assessed on the imbedded base of NANP resources."<sup>24</sup> As with the MFS proposal, Teleport's meaning is not clear. If Teleport means that fees should be assessed on all numbers already assigned, as well as all assigned in the future, then the proposal mimics MFS, and the same counter-arguments are applicable. If on the other hand, Teleport means that, in addition to paying fees for numbers already assigned, carriers should pay additional fees based upon previous use of NANP resources in

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<sup>22</sup> MFS at 6.

<sup>23</sup> We are all equal here, but some of us are more equal than others.

<sup>24</sup> Teleport at 6.

general, then the proposal becomes Draconian and seeks blood. The BOCs have been paying (by funding Bellcore) for NANP administration for ten years. To base a fee on retroactive use would mean that the BOCs would pay twice. SBC agrees with Bell Atlantic that:

The funding should be forward looking. There should be no attempt to recover for numbering resources that have already been assigned and that are currently in use. The Bell companies--through their funding of Bellcore and years of administering the NANP--have already paid for the resources that have been assigned through the existing numbering administration process, and there is no reason to try to recover these costs twice.<sup>25</sup>

#### VI. UNIFORM DIALING OF "1" AS A TOLL INDICATOR

An excellent example of why the Commission should, as a general rule, stay out of numbering issues is the proposal that a uniform national dialing pattern be implemented, using the digit "1" as a toll indicator. SWBT's dialing procedures already comply with this proposal, and federal intervention is unnecessary. In addition, though SBC supports the concept of uniform dialing using "1" as a toll indicator, any such plan would be extremely cumbersome to implement. Dialing plans, generally matters of state concern, are adopted for many reasons, including technical parameters, switch limitations, code utilization, oversight responsibility of state regulators and customer expectations. In some areas, customers are willing to dial one plus ten digits to maintain the toll indicator, while customers in other areas desire seven digit home NPA dialing, whether the call is local or toll. Also, some state commissions prescribe dialing plans.

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<sup>25</sup> Bell Atlantic at 5.

Uniform dialing is currently being addressed by the Industry Numbering Committee (INC) Dialing Plan Workshop, where the issue should remain. Involvement of the Commission at this stage would only further complicate an already complicated matter.

#### VII. CIC TRANSITION

As we stated in our Comments,<sup>26</sup> SBC believes that a six year CIC transition period is too long, primarily because of the dialing parity issue, but also because the 2000 CIC codes will probably not last six years. It is not surprising that companies standing to gain a competitive advantage from dialing disparity, such as AT&T<sup>27</sup> and MCI,<sup>28</sup> advocate the six year period. Other commentators want to extend the transition period to as much as 12 years.<sup>29</sup> This is clearly neither reasonable nor in the public interest.

SBC supports Sprint's suggestion that the Commission consider requiring carriers to turn in their excess CICs to help postpone CIC exhaust.<sup>30</sup> If the Commission does not choose an 18 month transition period, as SBC suggests, then SBC recommends that a monitoring scheme be adopted to allow the industry a realistic amount of time in which to react should the codes prematurely exhaust.

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<sup>26</sup> SBC at 13-16.

<sup>27</sup> AT&T at 3-7.

<sup>28</sup> MCI at 17-18.

<sup>29</sup> Vartec at 6, APCC at 4.

<sup>30</sup> Sprint at 14.



#### VIII. INTERSTATE, INTRALATA TRAFFIC

As SBC's Comments stated, we believe that as long as SWBT is not allowed to compete for interLATA traffic, any requirement that SWBT deliver interstate, intraLATA toll traffic to a presubscribed carrier will be the equivalent of prohibiting SWBT's provision of such service.<sup>31</sup> Predictably, those parties who would benefit from such a requirement support it with an odd variety of arguments. According to Ad Hoc, for example, "the mere possibility" that the BOCs might be put at a competitive disadvantage "should not dissuade the Commission from proceeding."<sup>32</sup> And Sprint complains that "no quid pro quo is required or justified in regards to the implementation of presubscription for interstate intraLATA toll calls," because "the BOCs retain a virtual monopoly over such facilities, and such monopoly is entirely unrelated to whether interstate intraLATA toll calls are subject to presubscription."<sup>33</sup>

The only remote link at all--and a tenuous one at best--between this issue and the administration of the North American Numbering Plan is that the NANPA assigns CICs. Thus, it would be inappropriate, as well as a denial of due process, for the Commission, in this docket, to order LECs to deliver interstate, intraLATA traffic to a customer's presubscribed IXC. Other than the predictable demagoguery of the IXC community, there is no record to support such an order. Neither does the record contain

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<sup>31</sup> SBC at 16-18.

<sup>32</sup> Ad Hoc at 14.

<sup>33</sup> Sprint at 16.

any support for, much less any serious discussion of, the so-called "two PIC" approach. A serious and thorough discussion of the many issues surrounding interstate, intraLATA traffic cannot be had in this docket. If the Commission truly feels that this issue warrants study, then a new, narrowly-focused docket should be established.

IX. CONCLUSION

As competition in the telecommunications industry increases, numbering disputes will grow in frequency and ferocity. Allies will become enemies, and rivals may find themselves on the same side of the barricade. The most that can be hoped for is a semblance of objectivity and a remembrance that the interests of the public and of the PSTN should guide the many difficult decisions to be made.

Respectfully submitted,

SOUTHWESTERN BELL CORPORATION

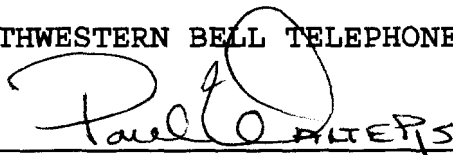
By Paula J. Fulks  
James D. Ellis  
Paula J. Fulks

Attorneys for  
Southwestern Bell Corporation

175 E. Houston  
Room 1218  
San Antonio, Texas 78205  
(210) 351-3424

SOUTHWESTERN BELL TELEPHONE COMPANY

By

A handwritten signature in dark ink, appearing to read "J. Paul Walters, Jr.", is written over a horizontal line. The signature is stylized with large, looping letters.

Robert M. Lynch  
Richard C. Hartgrove  
J. Paul Walters, Jr.

Attorneys for  
Southwestern Bell Telephone Company

One Bell Center, Room 3520  
St. Louis, Missouri 63101  
(314) 235-2507

June 30, 1994

**CERTIFICATE OF SERVICE**

I, Joseph Meier, hereby certify that the foregoing  
"Reply Comments of Southwestern Bell Telephone Company", In CC  
Docket No. 92-237, Phases One and Two, has been served this 30th  
day of June, 1994, to the Parties of Record.

  
Joseph C. Meier

Edward R. Wholl  
Campbell L. Ayling  
New England Telephone &  
Telegraph Company  
120 Bloomingdale Road  
White Plains, NY 10605

James L. Wurtz  
Pacific Telesis  
1275 Pennsylvania Avenue, N.W.  
Washington, D.C. 20004

Floyd S. Keene  
Larry A. Peck  
Mark R. Ortlieb  
Ameritech  
2000 W. Ameritech Center Drive  
Room 4H86  
Hoffman Estates, IL 60196-1025

Jeffrey S. Bork  
U S West, Inc.  
1020 19th Street, N.W.  
Suite 700  
Washington, D.C. 20036

M. Robert Sutherland  
Shirley A. Ransom  
BellSouth Corporation  
4300 Southern Bell Center  
675 W. Peachtree St., N.E.  
Atlanta, Georgia 30367

Michael S. Slomin  
Bell Communications Research, Inc.  
290 W. Mount Pleasant Avenue  
Livingston, NY 07039

James P. Tuthill  
Nancy C. Woolf  
Pacific Telesis  
140 New Montgomery Street  
Room 1523  
San Francisco, CA 94105

Linda D. Hershman  
Southern New England  
Telecommunications Corp.  
227 Church Street  
New Haven, Connecticut 06510

M. de B. Brown  
Pacific Telesis  
130 Kearny Street  
Room 3659  
San Francisco, CA 94108

R.E. Sigmon  
Cincinnati Bell  
201 E. 4th Street  
P.O. Box 2301  
Cincinnati, Ohio 45201

Roy L. Moris  
Allnet  
1990 M Street, N.W.  
Suite 500  
Washington, D.C. 20036

Darrell S. Townsley  
Illinois Commerce Commission  
160 North LaSalle Street  
Suite C-800  
Chicago, IL 60601

Judith St. Ledger-Roty  
Lynn E. Shapiro  
Intellicall, Inc.  
1200 18th Street, N.W.  
Washington, D.C. 20036

Josephine S. Trubek  
Rochester Telephone Corporation  
180 South Clinton Avenue  
Rochester, New York 14646

D. Kelly Daniels  
Telco Planning, Inc.  
808 The Pittock Block  
921 S.W. Washington  
Portland, OR 97205

Angela Burnett  
Information Industry Assoc.  
555 New Jersey Avenue, N.W.  
Suite 800  
Washington, D.C. 20001

Alex J. Haris  
Teleport  
One Teleport Drive  
Staten Island, NY 10311-1011

C/O Judith St. Ledger-Roty  
Paging Network, Inc.  
1200 18th Street, N.W.  
Washington, D.C. 20036

Paul Rodgers  
Charles D. Gray  
James Bradford Ramsay  
NARUC  
1102 ICC Building  
P.O. Box 684  
Washington, D.C. 20044

James L. Casey  
Air Transport Association  
of America  
1301 Pennsylvania Avenue, N.W.  
Washington, D.C. 20004

John L. Bartlett  
Robert J. Butler  
Aeronautical Radio, Inc.  
1776 K Street, N.W.  
Washington, D.C. 20006

Bruce D. Jacobs  
Glenn S. Richards  
1255 23rd Street, N.W.  
Suite 800  
Washington, D.C. 20037

Daniel L. Brenner  
David L. Nicoll  
NCTA  
1724 Massachusetts Avenue, N.W.  
Washington, D.C. 20036

David C. Henny  
Whidbey Telephone Company  
2747 E. State Highway 525  
Langley, Washington 98260-9799

Albert H. Kramer  
Robert F. Aldrich  
American Public Communications  
Council  
1201 New York Avenue, N.W.  
Penthouse Suite  
Washington, D.C. 20005-3919

Michael F. Altschul  
CTIA  
Two Lafayette Centre, Suite 300  
1133 21st Street, N.W.  
Washington, D.C. 20036

A. A. Kurtze  
Centel Corporation  
8725 Higging Road  
Chicago, IL 60631

David Cosson  
NTCA  
2626 Pennsylvania Avenue, N.W.  
Washington, D.C. 20037

Mark H. Goldberg  
Unitel Communications, Inc.  
200 Washington Street West  
Toronto, Ontario, Canada M5V 3C7

Werner K. Hartenberger  
J.G. Harrington  
Laura H. Phillips  
Dow, Lohnes & Albertson  
1255 23rd Street, Suite 500  
Washington, D.C. 20037

Daniel L. Bart  
GTE Service Corporation  
1850 M Street, N.W.  
Suite 1200  
Washington, D.C. 20036

ITS, Inc.  
1919 M Street, N.W.  
Room 246  
Washington, D.C. 20054

Loretta J. Garcia  
Donald J. Elardo  
MCI Telecommunications Corp.  
1801 Pennsylvania Avenue, N.W.  
Washington, D.C. 20006

Peter Guggina  
Robert W. Traylor, Jr.  
Consultants for MCI  
2400 N. Glenville Drive  
Richardson, TX 75082

John M. Goodman  
Karen Zacharia  
Attorneys for Bell Atlantic  
1710 H Street, N.W.  
Washington, D.C. 20006

Mark R. Hamilton  
Marsha Olch  
McCaw Cellular Communications,  
Inc.  
5400 Carillon Point  
Kirkland, WA 98033

James S. Blaszk  
Francis E. Fletcher, Jr.  
Attorneys for Ad Hoc Telecomm.  
Users Committee  
Gardner, Carton & Douglas  
1301 K Street, N.W.  
Suite 900 - East Tower  
Washington, D.C. 20005

Mark C. Rosenblum  
Robert J. McKee  
Albert M. Lewis  
Attorneys for AT&T Corp.  
295 N. Maple Avenue  
Room 3244J1  
Basking Ridge, NJ 07920-1092

R. Michael Senkowski  
Jeffrey S. Linder  
Wiley, Rein & Fielding  
1776 K Street, N.W.  
Washington, D.C. 20006

H. R. Burrows  
Network Resource Research  
F4, 160 Elgin Street  
Ottawa, Ontario, Canada K1G 314



Andrew D. Lipman  
Russell M. Blau  
Swidler & Berlin, Chartered  
3000 K Street, N.W.  
Washington, D.C. 20007

Jay C. Keithley  
Leon Kestenbaum  
Norina T. Moy  
Sprint Corporation  
1850 M Street, N.W., Suite 1100  
Washington, D.C. 20036

Mary McDermott  
Associate General Counsel  
USTA  
1401 H Street, N.W., Ste. 600  
Washington, D.C. 20005-2136

W. Richard Morris  
Sprint Corporation  
P.O. Box 11315  
Kansas City, MO 64112

Albert H. Kramer  
Robert F. Aldrich  
Keck, Mahin & Cate  
1201 New York Avenue, N.W.  
Penthouse Suite  
Washington, D.C. 20005-3919

William J. Cowan  
New York State Department of  
Public Service  
Three Empire State Plaza  
Albany, NY 12223

Jonathan D. Blake  
Ellen K. Snyder  
Covington & Burling  
1201 Pennsylvania Avenue, N.W.  
P.O. Box 7566  
Washington, D.C. 20044

Carl Wayne Smith  
Chief Regulatory Counsel  
Telecommunications (DOD)  
Code AR  
Defense Information Systems  
Agency  
701 S. Courthouse Road  
Arlington, Virginia 22204

Michael G. Hoffman, Esq.  
Vice President  
Legal & Regulatory Affairs  
VarTec Telecom, Inc.  
3200 West Pleasant Run Road  
Lancaster, Texas 75146

W. Theodore Pierson, Jr.  
richard M. Metzger  
Counsel for ALTS  
Pierson & Tuttle  
1200 Nineteenth Street, N.W.  
suite 607  
Washington, D.C. 20036